

US DISTRICT COURT  
WESTERN DIST ARKANSAS  
FILED

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF ARKANSAS  
El Dorado Division I

JUN 08 2016

DONALD WATSON and  
TONYA WATSON  
v.

DOUGLAS F. YOUNG, Clerk  
By

Deputy Clerk

NO. 16-1051

PLAINTIFFS

JUSTIN PIETSCH, and  
UNIFIRST HOLDINGS, LP

DEFENDANTS

NOTICE OF REMOVAL

TO: The United States District Court  
Western District of Arkansas, El Dorado Division I

The Circuit Clerk of Columbia County, Arkansas  
1 Court Square, Ste. 3  
P.O. Box 327  
Magnolia, AR 71754-0327

Michael W. Boyd  
Bell & Boyd, P.A.  
P.O. Box 841  
Magnolia, AR 71754-0841

Please take notice that the captioned case filed as Case No. CV 2016-76-4 in the Circuit Court of Columbia County, Arkansas, Civil Division, has been hereby removed to the United States District Court for the Western District of Arkansas, El Dorado Division. Defendants Justin Pietsch and Unifirst Holdings, LP file this Notice of Removal and state, as grounds for removal, the following:

1. This action was commenced by the filing of a Complaint in the Circuit Court of Columbia County, Arkansas, Civil Division, on May 9, 2016, and was assigned Case No. CV 2016-76-4. A copy of

the Complaint and Summons constituting all known documents filed by Plaintiffs with the Circuit Clerk in connection with this cause, are attached hereto and incorporated by reference as Exhibit "A".

2. Attached hereto as Exhibit "B" is a copy of the Defendants' Answer to Complaint filed in the Circuit Court of Columbia County.

3. At the time of the accident and through the present, Justin Pietsch is a citizen and resident of Ringgold, Bienville Parish, Louisiana. Mr. Pietsch resides at 1319 Pietsch Road, Ringgold, Bienville Parish, Louisiana.

4. Unifirst Holdings, LP is a foreign corporation registered to do business in the State of Arkansas. Its agent for service of process is "Corporation Service Company" at 300 Spring Building, Suite 900, Little Rock, Pulaski County, Arkansas.

5. Upon information and belief, Plaintiffs are citizens and residents of Columbia, Arkansas.

6. Complete diversity of citizenship exists between the Plaintiffs and the Defendants. The amount in controversy exceeds the sum of \$75,000, exclusive of interests and costs.

7. This is a civil action in which Plaintiffs seek damages in excess of \$75,000, exclusive of interest and costs, the amount required for federal diversity jurisdiction.

8. Therefore, this action is one over which a federal district court has original jurisdiction because there is complete

diversity of citizenship between the parties pursuant to 28 U.S.C. § 1332, and this case is removable under 28 U.S.C. § 1441(a) under the procedures set forth in 28 U.S.C. § 1446.

9. Defendants have given written notice of this removal by filing copies of this notice of removal with the Circuit Clerk of Columbia, Arkansas, and by providing copies of the Notice of Removal to Plaintiffs' attorney.

10. No admission of fact, law or liability is intended by the filing of this notice, and all defenses, motions and pleas are expressing reserved.

WHEREFORE, Separate Defendants, Justin Pietsch and Unifirst Holdings, LP give notice that this case has been removed from the Circuit Court of Columbia County, Arkansas, Civil Division, to the United States District Court for the Western District of Arkansas, El Dorado Division.

DATED this 7/11 day of June, 2016.

Respectfully submitted,

HUCKABAY LAW FIRM, PLC  
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BY

  
KATHRYN B. KNISLEY, #08169  
D. MICHAEL HUCKABAY, JR., #89135

CERTIFICATE OF SERVICE

I, KATHRYN B. KNISLEY, hereby certify that on the 7<sup>th</sup> day of JUNE, 2016, a true and correct copy of the above and foregoing pleading has been served via U.S. Mail on the parties listed below:

Michael W. Boyd  
Bell & Boyd, P.A.  
P.O. Box 841  
Magnolia, AR 71754-0841

  
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KATHRYN B. KNISLEY